

# **EXHIBIT D**

At I.A.S. Part \_\_\_\_\_ of the Supreme Court of the State of New York, held in and for the County of New York, at the County Courthouse thereof, located at 60 Centre, New York, NY 10007 on the \_\_\_\_\_ day of \_\_\_\_\_, 202\_\_.

PRESENT:

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

JSC

JANE DOE,

*Plaintiff,*

-against-

COREY SHADER,

*Defendant.*

Index No.: 161994/2024

ORDER TO SHOW CAUSE  
FOR LEAVE TO PROCEED  
PSEUDONYMOUSLY, WITH  
TEMPORARY  
RESTRAINING ORDER

UPON reading and filing the annexed Affirmation of Edward V. Sapone, Esq., dated December 18, 2024, and the Summons and Complaint, and upon due consideration,

LET Defendant COREY SHADER show cause at a hearing before this Court, at IAS Part \_\_\_\_\_, Room \_\_\_\_\_, of this Court located at \_\_\_\_\_ Centre Street, New York, New York 100\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, 202\_\_, at \_\_\_\_\_ o'clock a.m./p.m, or as soon thereafter as counsel can be heard, why an Order should not be entered:

- (i) Allowing Plaintiff to proceed anonymously using the "Jane Doe" pseudonym in the following caption:

JANE DOE,

*Plaintiff,*

-against-

COREY SHADER,

*Defendant.*

and deeming it proper on the grounds that Plaintiff has alleged sexual abuse in the instant action, and is thus afforded privacy protections under New York Civil Rights Law § 50-b; and

- (ii) Allowing Plaintiff to verify the Complaint pursuant to New York Civil Procedure Law & Rules 3020(d) using the “Jane Doe” pseudonym to maintain anonymity with an accompanying attorney affirmation from Plaintiff’s attorney confirming that the “Jane Doe” whose signature appears on the verification is the same “Jane Doe” referenced in the Complaint as Plaintiff; and
- (iii) Prohibiting the parties, their attorneys, and agents from publishing or disclosing Plaintiff’s true identity, however, Defendant Corey Shader and his counsel are not restricted from using the Plaintiff’s name or Personal Identifying Information (“PII”) in this litigation in any manner not inconsistent with this Order, including, but not limited to, in connection with investigation and fact-finding, communicating with potential witnesses, discovery, and negotiations (including mediation and/or arbitration); and
- (iv) Ordering that all papers filed in this action, and all judgments, orders, decisions, notices to the Court and any other document relating to this action refer to Plaintiff as “Jane Doe”

- and bear the caption shown in part (i) above, and directing the County Clerk to enter and record all papers in the action under the title "JANE DOE V. COREY SHADER"; and
- (v) Ordering that any document bearing the true name of the Plaintiff, or any document that tends to identify Plaintiff and/or Plaintiff's family, be redacted by the party filing such document, and that the original unredacted document be retained by the filing party for an in-camera inspection by the Court; and
  - (vi) Deeming the statement of venue in the Summons sufficient without disclosing Plaintiff's address pursuant to CPLR 305(a); and
  - (vii) Granting such and further relief as may be just and proper; and it is

ORDERED that, pending the hearing of this motion BEFORE THE JUSTICE TO BE ASSIGNED, the Clerk of this Court, upon payment of the proper fees, is hereby directed to assign an index number to this proceeding, and to accept for filing a Request for Judicial Intervention ("RJ"), bearing the following caption, namely:

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

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JANE DOE,

*Plaintiff,*

-against-

COREY SHADER,

*Defendant.*

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HON. JEANINE R. JOHNSON  
J.S.C.

DEC 19 2024

**ORDERED** that Plaintiff is permitted as interim relief, to maintain the above pseudonymous caption pending a hearing on this Order to Show Cause, and Defendant is temporarily restrained from disclosing Plaintiff's, or Plaintiff's family's, name or personal information to the public; and it is further

**ORDERED** that this Order to Show Cause is issued ex parte, and Plaintiff is not required to provide Defendant with prior notice of this Order pursuant to 22 NYCRR 202.8-e, having sufficiently demonstrated significant prejudice to Plaintiff by the giving of notice, based upon the Affirmation of Edward V. Sapone, dated December 18, 2024, and the Affirmation of Jane Doe, dated December 18, 2024; and it is further

**ORDERED** that, sufficient cause being alleged therefore, service upon the Defendant of a copy of this Order to Show Cause, together with the papers upon which it is based, by overnight service or any other method of service permitted under applicable New York law, on or before the day \_\_\_\_ of \_\_\_\_\_ 202\_\_, be deemed good and sufficient service. An affidavit or other proof of service shall be presented to this Court on the return date directed in the second paragraph of this order.

Enter,

\_\_\_\_\_  
J.S.C.